



ΕΛΛΗΝΙΚΗ ΕΝΩΣΗ ΠΡΟΣΤΑΣΙΑΣ  
ΘΑΛΑΣΣΙΟΥ ΠΕΡΙΒΑΛΛΟΝΤΟΣ  
HELLENIC MARINE ENVIRONMENT  
PROTECTION ASSOCIATION



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Athens, 24 July 2003

To the Docket Management Facility

USCG-2003-14749-46

Dear Sirs,

In accordance with your announcement that you will receive comments on the Interim Rules until 31 July 2003, we would like to bring to your attention the following.

In compliance with para 104.240 of USCG-2003-14749, foreign ships entering US Ports with MARSEC Level 3 in force, may take up additional security measures such as towage, waterborne security patrol, use of armed security personnel and underwater monitoring.

Given the limitations present on merchant vessels, it is important that provisions be made so that vessels coming to the US are timely informed on the following:

- (a) Particulars of USCG recognized entities for vessels to notify and at what time prior to their arrival.
- (b) Same for organizations capable of providing specially trained armed security group to board vessels upon request.
- (c) Same for organizations capable of providing underwater monitoring.

We consider essential that companies trading in the US know in advance the existence of such shore-based industry so that after ISPS Code comes into force on July 1, 2004 crews know that they are amply protected against security incidents.

As far as the communication-cooperation between Ship Security and Port Facility Security Officers as per para 104.245, it would be constructive if the USCG issued specific Communications Guidelines to foreign vessels bound for US Ports. Such guidelines would make clear that under specific security conditions no precious time is lost due to possible difficulties with English language being used by foreign nationals.

Many thanks for your attention,

Dimitris C. Mitsatsos  
Director General